

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

PNC Bank, National Association, successor to National City Bank, successor in interest to MidAmerica Bank, fsb

Plaintiff,

v.

Chicago Title Land Trust Company, as Trustee under the provisions of a certain Trust Agreement dated April 7, 2009 and known as Trust Number 8002352523; James C. McAuliffe; Agnieszka McAuliffe; James D. Schlenker, M.D., S.C.; United States of America,

Defendants.

Case No. 11 cv 06763

Assigned Judge: Virginia M.Kendall

Magistrate Judge: Nan R. Nolan

MOTION FOR JUDGMENT OF FORECLOSURE AND SALE

NOW COMES the Plaintiff, PNC Bank, National Association, successor to National City Bank, successor in interest to MidAmerica Bank, fsb, by its attorneys CROWLEY & LAMB, P.C., and moves the Court for the entry of a Judgment of Foreclosure and Sale in its favor and against the Defendant(s):

Chicago Title Land Trust Company, as Trustee under the provisions of a certain Trust Agreement dated April 7, 2009 and known as Trust Number 8002352523; James C. McAuliffe; Agnieszka McAuliffe; James D. Schlenker, M.D., S.C. and United States of America, and as grounds thereof state:

As appears from the Affidavit of Plaintiff placed on file in support of this Motion, and from the pleadings and admissions on file, there is no genuine issue as to any material fact, and the Plaintiff is entitled to a Judgment of Foreclosure and Sale in this case as a matter of law.

PNC Bank, National Association, successor to National City Bank, successor in interest to MidAmerica Bank, fsb

By: 

One of Its Attorneys

Patrick D. Lamb (ADRC#3128062)
Shannon McKinley (ARDC#6298914)
CROWLEY & LAMB, P.C.
221 N. LaSalle Street, Suite 1550
Chicago, Illinois 60601
(312) 670-6900
plamb@crowleylamb.com
smckinley@crowleylamb.com